

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Closed Captioning of Internet Protocol-)	MB Docket No. 11-154
Delivered Video Programming:)	
Implementation of the Twenty-First Century)	
Communications and Video Accessibility Act)	
of 2010)	

JOINT MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s Rules (47 C.F.R. § 1.46), Pluto, Inc. (“Pluto”) and Telecommunications for the Deaf and Hard of Hearing Inc., (“TDI” and together with Pluto the “Requestors”) respectfully submit this motion to extend the public comment and reply comment deadlines regarding Pluto’s request for temporary waiver of the Commission’s IP closed captioning rules with respect to certain platforms upon which users can access Pluto TV’s content (“Pluto Petition”).¹ On July 22, 2019, the Media Bureau (“Bureau”) found good cause to grant an initial motion for extension of time related to the Pluto Petition.² For the reasons expressed herein, Requestors respectfully move to extend the due dates for comments and reply comments in this proceeding by an additional 120 days to February 21, 2020 and March 6, 2020, respectively.³

¹ *Petition for Waiver of Pluto, Inc.*, MB Docket No. 11-154 (filed May 15, 2019).

² *Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, Order Granting Extension of Time to File Comments and Reply Comments, MB Docket No. 11-154, DA 19-290 (rel. July 22, 2019).

³ Pursuant to Rule 1.46(c), Requestors have notified Bureau staff responsible for acting on the motion that the motion is being filed and will notify other known interested parties.

Requestors have discussed the technological challenges encountered by Pluto as it has been investigating and implementing improvements to its closed captioning functionality. Requestors have agreed that it is in the interest of consumers to continue investigating the root causes of the technological challenges faced, and collaborate on methods to prevent future technological issues from arising. Requestors are also hopeful that the extension of time will provide additional opportunity to address encountered issues and reduce or eliminate the need for Pluto's Petition.

TDI's counsel, the Communications & Technology Clinic of Georgetown Law's Institute for Public Representation ("the clinic"), is a law school clinic. The requested extension of time will enable the clinic to represent TDI in this matter and file comments and reply comments. Requestors had discussed the possibility of a 90 day extension, but that would coincide with the second week of the Spring semester, preventing next semester's clinic students from meaningfully working with its client on this matter. The 120 day extension by contrast will provide additional time to investigate technological issues while ensuring meaningful representation of TDI.

The Commission should also grant this extension to ensure that people who are deaf or hard of hearing, the primary beneficiaries of the IP captioning rules under the CVAA, are afforded the best ability to weigh in on the accessibility issues raised in Pluto's Petition, while increasing the likelihood of additional compliant platforms by the time of the extended comment period.

Accordingly, Requestors respectfully ask that the due dates for comments and reply comments related to the Pluto Petition be extended until February 21, 2020 and March 6, 2020, respectively.

Respectfully submitted,

/s/

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